NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

DOCKET 98-57 Phase III

Respondent: Amy Stern Title: Director - Telecom Industry Services

REQUEST: Department of Telecommunications and Energy, Record Request

DATED: August 2, 2000

ITEM: DTE RR 2 Please provide the range of the interval provided on page 16 of the Panel Rebuttal Testimony for April and May 2000 and, if available, June 2000.

REPLY: The range of business day intervals for metric PR-2-01 (Average Interval Completed - No Dispatch) and PR-2-02 (Average Interval Completed - Dispatch) for retail 2-wire xDSL services is as follows:

Non-Dispatch Dispatch Shortest Longest Shortest Longest

April 2000 same day 37 1 31 May 2000 same day 40 1 39 June 2000 same day 110 1 29

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

DOCKET 98-57 Phase III

Respondent: Amy Stern Title: Director - Telecom Industry Services

REQUEST: Department of Telecommunications and Energy, Record Request DATED: August 3, 2000 ITEM: DTE RR 7 Please update RL/CVD exhibit 116, providing a two-to-four sentence

explanation for each change.

REPLY:

REPLY (cont'd):

Please see BÁ-MA's attached update of RL/CVD's Exhibit 116. The following updates were made:

(1) Added column for "Additional Loop".

RL/CVD showed the costs of the "First Loop" and the "96th Loop". However, in some cases they showed the cost of each additional loop in the 96th Loop column, while in other cases they showed the cost of an average loop. BA-MA has added an extra column to show both the cost of an average loop, and the cost of each additional loop (i.e., when the first and additional approach is taken).

(2) Corrected Engineering Implementation rate.

BA-MA corrected the rate for Engineering Implementation from \$1,781.22 to \$1,453.09 to reflect the latest tariff rate.

(3) Removed certain charges.

BA-MA removed charges that would not occur for a "typical" loop (e.g., manual surcharge, trouble misdirect charge, manual loop qualification, and cooperative testing).

(4) Applied 20% frequency to Outside Dispatch. (Updated Exhibit 116, Note 3)

BA-MA assumes the frequency of occurrence of an outside dispatch would be 20% on retail service orders (see Panel Rebuttal Testimony page 16). The 20% frequency was applied to the Outside Dispatch rate of \$28.31 to produce an average charge per loop of \$5.66.

(5) Typical Augment job size. (Updated Exhibit 116, Note 1)

BA-MA assumed that a CLEC would do more than 96 lines of work on a typical augment job going forward, and used 192

(2)

lines (the equivalent of two splitter shelves) instead. The more work done on each augment job, the lower the average cost per loop to the CLEC.

(6) Installment Payment Option. (Updated Exhibit 116, Note 4)

BA-MA showed the effect of the Installment Payment Option available to CLECs under the current D.T.E. tariff on amortizing the non-recurring charges into monthly payments.

NET RR# 103

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

DOCKET 98-57 Phase III

Respondent: John White

Title: Executive Director - Wholesale Services

REQUEST: Department of Telecommunications and Energy, Record Request

DATED: August 3, 2000 ITEM: DTE RR 8 Please provide whatever information is available that shows either the amount of time taken by BA or its vendors or the labor costs incurred in NY to perform central office equipment installation functions for line-sharing.

REPLY: Attached is a spread sheet that provides information on the labor cost of the central office (CO) work for 25 of the first offices with line sharing installations for CLECs in New York. The first 23 examples show the labor costs provided by the installation vendors for the BA portion of the job at the location's listed. For these locations, additional work is required for the CLEC's portion of the job. Examples 24 and 25 provide labor costs for the entire physical installation job, i.e., both the BA and the CLEC portions.

NET RR# 108

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

DOCKET 98-57 Phase III

Respondent: John White

Title: Executive Director - Wholesale Services

REQUEST: Department of Telecommunications and Energy, Record Request

DATED: August 3, 2000

ITEM: DTE RR 9 For engineering work orders, please explain how it takes 35 minutes Page 5

to just receive the completion notice from construction?

REPLY: The 35 minutes identified as "Receive Completion Notice From Construction" in Exhibit III, Line 35 of Mr. Meacham's Direct Testimony, is the result of a work activity survey. It includes work processes performed by Engineering personnel upon notification of work completion as illustrated below.

The Construction Control Foreman informs the Outside Plant Engineer and the Reimbursable Construction Engineer of work completion. At that point the OSPE/RCE will log onto ECRIS and confirm that the job has been properly completed in ECRIS. If not, the control foreman is contacted to verify job completion and to have the job completed in ECRIS. The OSPE/RCE will then log into ECRIS once again and verify that the job has been completed. The RCE/OSPE will then mark the job as closed, and run a completion report through ECRIS. The report is then compared against the original job print or work order to verify that the original request has been completed. This requires that the OSPE/REC verify as complete and match each element on the original engineering work order with the detailed ECRIS printout. Any corrections or additions are noted and added at this time. The Work print/Job Order is then marked complete with any field modifications added. The job is then officially marked as being complete.

NET RR# 109

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

DOCKET 98-57 Phase III

Respondent: Amy Stern

Title: Director - Telecom Industry Services

REQUEST: Department of Telecommunications and Energy, Record Request

DATED: August 3, 2000

ITEM: DTE RR 10 Please file revisions to tariff pages.

REPLY: Please see attached revision to Part M, Section 5.2.10, page 6.

NET RR# 110

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

DOCKET 98-57 Phase III

Respondent: Jamie Virga

Title: Senior Specialist-Regulatory

REQUEST: Department of Telecommunications and Energy, Record Request

DATED: August 3, 2000
ITEM: DTE RR 11 (a) Please explain which activities, with respect to collocation augments, are sequential and which can be performed simultaneously. (b) Which activities would be necessary if BA performed the cable

Augment procedure described by Mr. Riolo yesterday?

REPLY: (a) Please see attached.

(b) BA-MA assumes the question refers to the activities described by Mr. Riolo on August 2, 2000, as reflected on pages 325 and 326 of Volume 2 of the transcript. BA-MA notes that the limited, overly simplified set of activities described by Mr. Riolo, all of which would have to be performed, are insufficient to complete a Page 7

collocation augment involving the addition of cabling. Completing a cable augment requires many other important activities, which Mr. Riolo's simplistic description did not mention, including but not limited to the following activities.

For example, Mr. Riolo's simplistic description did not include the steps involved to process the application, engineer the job, or order and receive the required materials. Further, his description fails to take into account the need to install termination blocks at both the POT Bay and Main Distribution Frame and then physically terminate the cables. Moreover, Mr. Riolo's description did not include a requirement that the cables be tested to insure they were installed properly or to inventory these cables in BA-MA's systems.

NET RR# 111

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

DOCKET 98-57 Phase III

Respondent: Amy Stern

Title: Director - Telecom Industry Services

REQUEST: Department of Telecommunications and Energy, Record Request

DATED: August 3, 2000 ITEM: DTE RR 14 Please provide diagrams showing the configuration of SAC cables and jumper cables for the two scenarios discussed, along with an accompanying expl anati on.

REPLY: Please see attached diagrams. The first diagram shows the configuration of SAC cables and jumper cables under the Option C splitter arrangement and also includes explanatory notes. The second diagram depicts the configuration of SAC cables and jumper cables required under the scenario proposed by Covad where the splitter is mounted on the MDF. This diagram also includes explanatory notes.

NET RR# 112

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

DOCKET 98-57 Phase III

Respondent: Amy Stern Title: Director - Telecom Industry Services

REQUEST: Covad Communications Co., Record Request

DATED: August 2, 2000 ITEM: Covad RR # 1: What time does BA-MA consider "close of business" in its service centers for purposes of determining met or missed due dates?

REPLY: BA-MA uses a "close of business" of midnight for purposes of determining whether BA-MA has met or missed a due date.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

DOCKET 98-57 Phase III

Respondent: John White

Title: Executive Director - Wholesale Services

REQUEST: Covad Communications Co., Record Request

DATED: August 2, 2000 ITEM: Covad RR # 2: Please provide the best information BA-MA has on the number of maintenance test units in the field - recognizing BA can't give an exact number

REPLY: The number of BA-MA loops that have Maintenance Test Units installed is unknown. No inventory of these devices nor the locations or loops on which they are installed exist in BA-MA's databases.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

DOCKET 98-57 Phase III

Respondent: John White

Title: Executive Director - Wholesale Services

REQUEST: Covad Communications Co., Record Request

DATED: August 2, 2000 ITEM: Covad RR # 3 Please provide the wired and office test date and the retail interval for Infospeed service

REPLY: The Retail Interval for Infospeed service - calculated from the time an end-user contacts the Internet Service Provider (including BA Internet Services or BAIS) until DSL service is available to the end-user - is typically 15 business days.

Orders for Infospeed do not carry a formal critical date process and thus have no formal "Wired and Office Test" or WOT date associated with the order. Infospeed orders, however, do carry a Network Date Due that is typically "Business Day 7" of the overall 15 business day interval.

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NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

DOCKET 98-57 Phase III

Respondent: John White

Title: Executive Director - Wholesale Services

REQUEST: Covad Communications Co., Record Request

DATED: August 2, 2000

ITEM: Covad RR # 4: Regarding the data provided on page 16 of BA-MA's Panel Rebuttal Testimony, please provide a breakdown of the reasons for the dispatches in April and May. How many of those dispatches were for maintenance test unit removal?

REPLY: Dispatches required to complete installations of retail Infospeed Service in April and May 2000 could have occurred for a number of reasons, including removal of MTUs, correction of non-standard or defective wiring conditions, and installation of some splitters. There is no unique identifier or coding associated with an order that specifically indicates the reason for the dispatch. Consequently, there is no way to sort for the differing reasons. The only potential source for a breakdown of the type requested would involve review of each service order for information which may or may not have been entered or even remain on the final version of the order. This process would be extremely burdensome and time-consuming.

NET RR# 88

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

DOCKET 98-57 Phase III

Respondent: John White

Title: Executive Director - Wholesale Services

REQUEST: Covad Communications Co., Record Request

DATED: August 2, 2000 ITEM: Covad RR# 5 Please provide the list of central office locations where BA-MA was ready to wire Covad's splitters before they arrived.

REPLY: The central offices where BA-MA's installation work was started in June 2000 are Natick, Sudbury, Milford, Sharon, Lowell, Reading, Acton, Springfield. Covad had submitted 55 valid collocation line sharing applications by April 15, 2000. Orders were issued for materials and engineering specifications for all locations. As reviewed in the Collaborative/Project Management process, installations were not to start until all of the material was delivered, including the splitter shelves. The splitter shelves were due during the first week of June. They were not received from Covad until the first week of July. The splitters were shipped in bulk to warehouses where they were then sorted and matched with jobs. Based on the delay in the splitter delivery and the missing of the scheduled completions, BA-MA decided to start some of the jobs oven though BA MA's Equipment Installation did not have all start some of the jobs even though BA-MA's Equipment Installation did not have all of the material.

NET RR# 92

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

DOCKET 98-57 Phase III

Respondent: Jamie Virga

Title: Senior Specialist-Regulatory

REQUEST: Covad Communications Co., Record Request

DATED: August 2, 2000

ITEM: Covad RR #6 Please provide the subintervals that the project manager for collocation augments uses in managing the collocation augment to arrive at the 76 business day interval.

REPLY: All requests for physical collocation, whether such request is for a new collocation arrangement or an augment to an existing collocation arrangement, are tracked using the same major milestones. Those milestones are:

- -- Receipt of completed application
- -- Letter acknowledgment of receipt of completed application
- -- Collocation Request Response Form (CRRF) Due Date
- -- Response Letter to CLEC
- -- Capacity Creation Request (CCR) Due Date Page 13

- -- Telephone Equipment Order (TEO) Issue Date
- -- Receipt of material
- -- Installation start
- -- Installation complete
- -- Pre-Acceptance Checklist Due to Complete
- -- Connecting Facility Assignment (CFA) Due Date (if applicable)
- -- Collocation Acceptance Meeting (CAM) Notice to CLEC
- -- CAM Completed (Walk through with CLEC)
- -- Billing Initiated

NET RR# 93

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

DOCKET 98-57 Phase III

Respondent: John White

Title: Executive Director - Wholesale Services

REQUEST: Covad Communications Co., Record Request

DATED: August 2, 2000 ITEM: Covad RR# 7: Does Bell Atlantic own any Edge switches in MA?

REPLY: BA-MA does not have an Edge switch deployed in Massachusetts. For this purpose, BA-MA defines an "Edge Switch" as an ATM switch used in a CO to disaggregate data traffic from a Remote Terminal and route the traffic to multiple Page 14

CLECs.

NET RR# 99

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

DOCKET 98-57 Phase III

Respondent: Amy Stern Title: Director - Telecom Industry Services

REQUEST: Covad, Record Request DATED: August 2, 2000 ITEM: Covad RR 8 Did any of the 13 people whose names are listed on the document "Bell Atlantic Policy for ADSL Unbundling in the RT" sign the document? If so, please provide the signed copy.

REPLY: No.

NET RR# 102

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

DOCKET 98-57 Phase III

Respondent: John White

Title: Executive Director - Wholesale Services

REQUEST: Covad, Record Request
DATED: August 3, 2000
ITEM: Covad RR 9 What is the false dispatch rate, per 100 loops, for retail POTS?
REPLY: The current level of false dispatches (CPE/TOK/FOK) per 100 lines measured in
NewYork for retail services over the past six months (January through June 2000)
included in the C2C as metric MR 2-05-2100 is 1.25. The similar measure for Massachusetts for the same period is 0.91 reports per 100 lines.

NET RR# 106

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

DOCKET 98-57 Phase III

Respondent: Jamie Virga Title: Senior Specialist-Regulatory

REQUEST: Digital Broadband, Record Request DATED: August 2, 2000 ITEM: DB RR# 1 How does BA-MA determine if there is space on the POT bay to terminate cable? Is there an automated process for doing that?

REPLY: BA-MA makes this determination by conducting a site survey. No automated process exists.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

DOCKET 98-57 Phase III

Respondent: Jamie Virga

Title: Senior Specialist-Regulatory

REQUEST: Digital Broadband, Record Request

DATED: August 2, 2000

ITEM: DB $\overline{\text{RR}}\#$ 2 Please provide copies of documentation of what work needed to be performed to accommodate augment arrangements that included cabling additions for the month of May 2000.

REPLY: BA-MA completed 84 augments that included cabling in May 2000. The requested data on these 84 jobs is not available in a database or central location. Therefore, BA-MA would need to undertake a time-consuming, burdensome and costly manual work effort to determine the work required for each of those augments.

Attached are copies of the detailed engineering specifications for three augments that included cabling and were completed in May 2000. These jobs were randomly selected from files maintained by BA-MA at its Boston, MA offices. The attached specifications document the materials ordered and the physical work BA-MA's equipment installation force performed to complete these augments, each of which included cable additions. The installation work outlined on the attached must be completed in accordance with installation practice number IP72201. The attached documentation does not include additional activities that must be performed by BA-MA or its engineering vendor prior to and subsequent to the actual installation activities. Please see BA-MA's Rreply to DTE RR 11.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

DOCKET 98-57 Phase III

Respondent: Jamie Virga

Title: Senior Specialist-Regulatory

REQUEST: Digital Broadband, Record Request

DATED: August 2, 2000
ITEM: DB RR# 3 Please provide the number of instances where there was no space available on a POT Bay for April, May, and June 2000.

REPLY: BA-MA completed 187 collocation augments involving cabling over the period April through June 2000. The requested data on these 187 jobs is not available in a database or central location. Therefore, BA-MA would need to undertake a time-consuming, burdensome and costly manual work effort to determine the work required for each of those augments.

As a general matter, BA-MA would expect the number of instances where space was unavailable on a POT Bay to be relatively few, although this assumption would have to be verified by a site visit in each instance. Such a condition is more likely to occur in the case of a SCOPE or CCOE arrangement where there is a shared POT Bay serving multiple CLEC customers, rather than in the case of a traditional physical (cage) arrangement where a POT Bay is dedicated to a single CLEC customer.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

DOCKET 98-57 Phase III

Respondent: John White Title: Executive Director - Wholesale Services

REQUEST: Digital Broadband, Record Request

DATED: August 2, 2000
ITEM: DB RR# 4: Please provide copies of lab test results that address the possibility of interference between ADSL and SDSL service.

REPLY: Attached is a copy of a draft report that was provided by BA to CLECs involved in the New York xDSL/Line Sharing Collaborative.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

DOCKET 98-57 Phase III

Respondent: Amy Stern Title: Director - Telecom Industry Services

REQUEST: Rhythms Links Record Request DATED: August 1, 2000 I.TEM: RL RR 1 Please clarify exactly when BA-MA first started offering Infospeed in

Massachusetts.

REPLY: BA-MA first offered Infospeed on March 24, 1999.

NET RR# 82

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

DOCKET 98-57 Phase III

Respondent: John White

Title: Executive Director - Wholesale Services

REQUEST: Rhythms Links Record Request

DATED: August 1, 2000 ITEM: RL RR 2 (a) How many new hires has BA-MA made to their central office

technician force within the last six months?

(b) How many central office technician jobs have been vacant in BA-MA in the last 6 months?

REPLY: (a) BA-MA Network Operations has increased the number of total central office technicians (COT)s by 60 since January 31, 2000. As a result of the increase in workforce and employee churn, 93 COT positions were filled by internal candidates and 69 COT positions were filled by external candidates.

(b) As of July 28, 2000, there are 35 vacant COT positions in BA-MA Network Òpérations, of which 9 have pending offers and 26 remain open.

NET RR# 83

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

DOCKET 98-57 Phase III

Respondent: Amy Stern Title: Director - Wholesale Markets

REQUEST: Rhythms Links Record Request DATED: August 1, 2000 ITEM: RLI RR 3 (a) In the last three months how many line-sharing orders have "fallen out" because of a bad CFA, across the BA footprint? (b) How many of those orders (bad CFA) were caused by BANDI in New York?

REPLY: (a) The requested data is not tracked and no formal documentation exists. Generally, this has been a problem for all types of services, and based on early indications, this trend is continuing with line sharing orders.

(b) There has been some bad CFA assignments from all DLECs including BANDI. However, thé amounts cannot be quantified.

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NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

DOCKET 98-57 Phase III

Respondent: John White

Title: Executive Director - Wholesale Services

REQUEST: Rhythms Links Record Request

DATED: August 1, 2000

ITEM: RLI RR 4 (a) Please list the top five line-sharing errors (based on numbers)

caused by DLECs and provide the underlying data to support your conclusion.

(b) How many of these errors were caused by BANDI?

REPLY: As stated in BA-MA's Reply to RLI RR 3, there is no documentation available. However, the most common queries returned to DLECs requesting line sharing are:

- · Invalid EATN on LSR (Main Telephone number of end user on a multiline account)
- \cdot Incorrect SBN for the ACTL (Billing account number of the DLEC which is specific to the colocation office)
- · Account ineligible for Line sharing due to fact that it is not a BA retail account (Either Resold or Platform service)
- \cdot Account ineligible for Line sharing due to circuit format on line on which line sharing is requested
- · Ineligible class of service for line sharing (e.g., Centrex service)

BA-MA does not track the number of errors by line sharing orders. However, BA-MA can state that BANDI and Rhythms Links have experienced most, if not all, of above error types.

NET RR# 84

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

DOCKET 98-57 Phase III

Respondent: Amy Stern Title: Director - Telecom Industry Services

REQUEST: Rhythms Links Record Request

DATED: August 2, 2000
ITEM: RLI RR 5: Please provide the performance data for Infospeed for PR-6-03, which is the percent installation troubles reported within 30 days.

REPLY: The percent troubles reported within 30 days of an installation for Infospeed service as reported in metric PR-6-03 for retail 2-wire xDSL service is as follows:

April 2000 6.58

May 2000 7.94

June 2000 6.20

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

DOCKET 98-57 Phase III

Respondent: Jamie Virga Title: Senior Specialist-Regulatory

REQUEST: Rhythms Links, Record Request DATED: August 2, 2000 ITEM: RLI RR 6 Please provide the range of days for collocation augments that support the average of 68 days.

REPLY: The range of days supporting the average augment interval in Massachusetts for the first six months of 2000 is 49 to 89 business days.

COMMONWEALTH OF MASSACHUSETTS

DOCKET 98-57 Phase III

Respondent: John White

Title: Executive Director - Wholesale Services

REQUEST: Rhythms Links Inc., Record Request DATED: August 2, 2000 ITEM: RLI RR 7 Have the Mesa 4 and 6 cabinets been delivered in Massachusetts? REPLY: No.

NET RR# 100

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

DOCKET 98-57 Phase III

Respondent: Amy Stern Title: Director - Telecom Industry Services

REQUEST: Rhythms Links Inc., Record Request DATED: August 2, 2000 ITEM: RLI RR 8 Does BA have a tariffed offering for such a facility from the RT to the central office? When will this tariff be available?

REPLY: No. BA-MA has not filed a tariff offering for feeder subloops because it has only very recently seen any CLEC interest in such an offering despite discussions with CLECs on the subject extending back over a year. Nevertheless, BA-MA has offered CLECs interconnection to unbundled feeder subloops through interconnection agreements and will file a tariff when any real demand materializes.

NET RR# 101

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

DOCKET 98-57 Phase III

Respondent: Bruce Meacham Title: Senior Specialist

REQUEST: Rhythms Links Inc., Record Request

DATED: August 3, 2000 ITEM: RLI RR 9 Please substantiate the claim that the common-cost factor is specific to wholesale.

REPLY: The common cost factor is specific to wholesale operations since retail costs have been removed in the development of the factor. Please see BA-MA's Reply to RL/CVD 1-68.

NET RR# 104

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

DOCKET 98-57 Phase III

Respondent: Bruce Meacham Title: Senior Specialist

REQUEST: Rhythms Links Inc., Record Request

DATED: August 3, 2000 ITEM: RLI RR 10 Please confirm whether BA imposes the common-cost factor in this collocation charges for new collocation arrangements. Please provide the factor.

REPLY: BA-MA applies the common cost factor to all recurring collocation elements. The common cost factor is 0.0085.

NET RR# 105

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

DOCKET 98-57 Phase III

Respondent: Bruce Meacham Title: Senior Specialist

REQUEST: Vitts, Record Request DATED: August 3, 2000
ITEM: Vitts RR 1 Has Verizon performed any stand-alone analysis of the incremental cost of installing a splitter? If so, please provide that cost study. Please verify whether that study was a stand-alone incremental cost-study of installing a

splitter.

REPLY: No.